

REMARKS/ARGUMENTS

Favorable reconsideration of this application, in view of the above amendments and the following remarks, is respectfully requested.

Claims 29, 31-40 and 42-44 remain pending in this application. By this amendment, Claims 29, 31-40 and 42-44 have been amended. Support for the amendments to Claim 29 is found, by way of non-limiting example, in the specification page 4, lines 21-34 and page 11, lines 7-32. Other amendments have been made to the claims to place them in a preferred form for U.S. practice. Accordingly, it is respectfully submitted that no new matter has been added.

In the outstanding Office Action, Claims 29, 35-38, 40 and 42 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bala et al. (U.S. Patent No. 2002/0056091 A1, hereinafter “Bala”) in view of Dagtas et al. (U.S. Patent No. 6,859,803 B2, hereinafter “Dagtas”) and further in view of Tang et al. (U.S. Patent No. 7,290,029 B2, hereinafter “Tang”); Claims 31, 32, 34 and 39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bala in view of Dagtas and further in view of Tang and further in view of Thint et al. (U.S. Patent No. 7,243,105 B2, hereinafter “Thint”); Claims 33 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bala in view of Dagtas and further in view of Tang and further in view of Martino et al. (U.S. Patent No. 2003/0126108 A1, hereinafter “Martino”); and Claim 44 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bala in view of Dagtas and further in view of Tang, Martino, and Thint.

Claim 29 recites:

at least once splitting said multi-user profile based on user features, wherein said multi-user profile comprises a combination of user profiles of all users of a consumer device, and wherein said user features include predetermined schemes or rules according to which said individual user of the consumer device makes selections in an application of said consumer device,

wherein said at least once splitting includes:

performing a tentative split according to said user features to generate a first and a second sub user profiles;

calculating a relative difference between said two sub user profiles;

performing said performing a tentative split and calculating said relative difference until all or a predetermined number of tentative splits are performed; and

splitting said multi-user profile according to that tentative split that yields the highest relative difference in case said relative difference lies above a predetermined threshold.

It is respectfully submitted that these features are neither disclosed by nor rendered obvious by Bala, Dagtas, Tang, Thint, Martino, or any conceivable combination thereof.

Bala describes a software agent residing locally in a user's computer in order to track the user's network interactions and provide targeted promotions with optional coupons.<sup>1</sup>

Bala provides targeted on-line promotions to users.<sup>2</sup> Upon initial installation of the software agent the user may be queried in order to receive a user profile which is then transmitted to the server 36.<sup>3</sup> Bala states "[t]he user profile can be used by server 36 to generate, for example, a file 12 containing the information such as key words and network addresses, used by agent application 24 to determine when to retrieve and display a promotion."<sup>4</sup>

Bala explains that the user profile "can include any information identifying or characterizing the user such a name, address, gender, age, household income, and a set of check boxes indicating areas of interest such as hobbies and activities."<sup>5</sup> Bala adds that "users can potentially be characterized or grouped with other users based upon particular criteria involving the user profiles for targeting or promotions or coupons to that group."<sup>6</sup>

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<sup>1</sup> Paragraph [0017].

<sup>2</sup> Paragraph [0037].

<sup>3</sup> Paragraph [0038].

<sup>4</sup> Paragraph [0038].

<sup>5</sup> Paragraph [0039].

<sup>6</sup> Paragraph [0039].

Therefore, Bala does not describe a splitting of a multi-user profile based on user features, where the user features include predetermined schemes or rules according to which an individual user of a consumer device makes selections in an application of the consumer device as recited in Claim 29. That is, Bala does not describe a consumer device or a splitting based on user features characterizing predetermined schemes or rules. Furthermore, Bala does not describe a multi-user profile comprising a combination of user profiles of all users of a consumer device. Rather, Bala describes that users can be categorized or grouped. This is contrasted with the recitation in Claim 29 including a combination of user profiles of all users of a consumer device.

Dagtas has been asserted in the Office Action as describing “[e]ach word pair in word pair database 450 has an assigned word pair weight factor.”<sup>7</sup> Dagtas however fails to correct the deficiencies of Bala pointed out above because Dagtas fails to describe splitting a multi-user profile as recited in Claim 29.

With regard to Tang, the Office Action asserts:

Tang also discloses a) performing a tentative split according to user features to generate a first and a second sub user profile, b) calculating the relative difference between the two sub user profiles, c) performing steps a) to b) until all or predetermine number of tentative splits are performed and splitting the multi-user profile according to that tentative split that yields the highest relative difference in case said relative difference lies above a predetermined threshold (...the user profile divided into two sub-areas: History results area is used to store the candidate character...) (col. 4, lines 42-49). This suggests the dividing user profiles and values for each subset of sub profile.

Applicants respectfully disagree.

Tang states “the user profile is divided into two sub-areas: History Results Area and Current Input State Area, wherein, the History Results Area is used to store the candidate characters generated by different engines in Engine Pool 314 as well as the confidence values

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<sup>7</sup> Column 9, lines 13-15.

of each candidate character.”<sup>8</sup> Tang adds “[s]everal sub-modules are included in this User Profile Manager 305 to respond to the Operation Manager 308.”<sup>9</sup> That is, Tang describes a division of a user profile into two sub-areas without describing performing a tentative split according to user features to generate a first and a second sub-user profiles, calculating relative difference between the two sub-user profiles, repeating the performing and calculating until all or a predetermined number of tentative splits are performed and splitting the multi-user profile according to that tentative split that yields the highest relative difference in case said relative difference lies above a predetermined threshold as recited in Claim 29.

Neither Thint nor Martino correct the deficiencies of Bala, Dagtas, and Tang pointed out above because neither reference describes the features of Claim 29 quoted above.

It is respectfully submitted that Claims 31-40 and 42-44 are patentable at least for the reasons argued above with regard to Claim 29 from which they depend.

Accordingly, it is respectfully requested that the rejections of Claims 29, 31-40 and 42-44 be reconsidered and withdrawn, and that Claims 29, 31-40 and 42-44 be found allowable.

Consequently, for the reasons discussed in detail above, no further issues are believed to be outstanding in the present application and the present application is believed to be in condition for formal allowance. Therefore, a Notice of Allowance is earnestly solicited.

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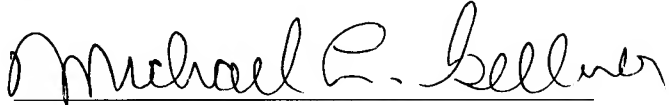
<sup>8</sup> Column 4, lines 42-47.

<sup>9</sup> Column 4, lines 50-51.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact the undersigned representative at the below-listed telephone number.

Respectfully submitted,

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A handwritten signature in black ink, reading "Michael L. Gellner", written over a horizontal line.

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